

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

-VS-

ESTEBAN RAYGOSA-ESPARZA,  
ALDO PEREZ, AND TOMAS SALINAS-RUIZ,  
Defendants

NO. 3:10-CR-069

**INDICTMENT**

FILED  
SCRANTON

MAR 09 2010

THE GRAND JURY CHARGES:

**COUNT 1**

PER M. B. P.  
DEPUTY CLERK

On or about October 9, 2009, in Wayne County, within the Middle District of  
Pennsylvania, the defendants,

ESTEBAN RAYGOSA-ESPARZA,  
ALDO PEREZ, AND  
TOMAS SALINAS-RUIZ

did knowingly and willfully combine, conspire, confederate and agree together to commit an  
offense against the United States, that is,

- (a) to knowingly and intentionally assault another person with a dangerous weapon,  
with the intent to do bodily harm and without just cause or excuse, in violation of  
Title 18, United States Code, Sections 7(3) and 113(a)(3) and 2;

**OVERT ACTS**

In furtherance of this conspiracy, and to effect and accomplish the objects of the  
conspiracy, the Defendants did commit and cause to be committed, the following overt acts,  
among others, in the Middle District of Pennsylvania:

1. On or before October 9, 2009, the Defendants agreed to assault an inmate who was

incarcerated at the United States Penitentiary at Canaan, Pennsylvania.

2. On or about October 9, 2009, the Defendants Esteban Raygosa-Esparza, Aldo Perez, and Tomas Salinas-Ruiz entered Cell 225 within the D-1 Unit of the United States Penitentiary at Canaan, Pennsylvania.

3. On or about October 9, 2009, Defendants Esteban Raygosa-Esparza, Aldo Perez, and Tomas Salinas-Ruiz assaulted the other inmate within Cell 225.

4. After the victim inmate exited Cell 225, Defendants Aldo Perez and Tomas Salinas-Ruiz threw the victim inmate to the floor and struck and kicked him repeatedly while Defendant Esteban Raygosa-Esparza struck the victim inmate with a lock connected to a length of cloth or leather.

All in violation of Title 18, United States Code, Section 371.

## **COUNT 2**

On or about October 9, 2009, in Wayne County, within the Middle District of Pennsylvania, the defendants,

ESTEBAN RAYGOSA-ESPARZA,  
ALDO PEREZ, AND  
TOMAS SALINAS-RUIZ

at a place within the territorial jurisdiction of the United States, namely the United States Penitentiary at Canaan, Pennsylvania, on land acquired for the use of the United States and under its concurrent jurisdiction, did knowingly and intentionally assault another person with a dangerous weapon, with the intent to do bodily harm and without just cause or excuse.

In violation of Title 18, United States Code, Sections 7(3) and 113(a)(3) and 2, and Pinkerton v. United States, 328 U.S. 640, 66 S.Ct. 1180, 90 L.Ed. 1489 (1946)(Pinkerton

liability).

THE GRAND JURY FURTHER CHARGES:

**COUNT 3**

On or about October 9, 2009, in Wayne County, within the Middle District of Pennsylvania, the defendant,  
  
ESTEBAN RAYGOSA-ESPARZA,  
  
an inmate of the United States Penitentiary at Canaan, Pennsylvania, knowingly possessed a prohibited object, that is, a weapon in the form of a lock connected to a length of cloth or leather, which was contrary to rules established by the Bureau of Prisons.

In violation of Title 18, United States Code, Sections 1791(a)(2).

**A TRUE BILL:**

March 9, 2010  
DATE

GRAND JURY FOREPERSON

  
DENNIS C. PFANNENSCHMIDT  
United States Attorney